

EXHIBIT AA

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

VIRGINIA COALITION FOR
IMMIGRANT RIGHTS; LEAGUE OF
WOMEN VOTERS OF VIRGINIA;
LEAGUE OF WOMEN VOTERS OF
VIRGINIA EDUCATION FUND;
AFRICAN COMMUNITIES
TOGETHER,

Plaintiffs,

v.

SUSAN BEALS, in her official capacity
as Virginia Commissioner of Elections;
JOHN O'BANNON, in his official
capacity as Chairman of the State Board
of Elections; ROSALYN R. DANCE, in
her official capacity as Vice-Chairman of
the State Board of Elections; GEORGIA
ALVIS-LONG, in her official capacity as
Secretary of the State Board of Elections;
DONALD W. MERRICKS and
MATTHEW WEINSTEIN, in their
official capacities as members of the
State Board of Elections; and JASON
MIYARES, in his official capacity as
Virginia Attorney General,

Defendants.

Case No. 1:24-cv-01178 (Lead)

Case No. 1:24-cv-01807

Judge Patricia Tolliver Giles

SUPPLEMENTAL DECLARATION OF JOAN PORTE

Pursuant to 28 U.S.C. § 1746, I, Joan Porte, declare as follows:

1. I am the President of the League of Women Voters of Virginia and the League of Women Voters of Virginia Education Fund (collectively LWVVA or the League). I have served in this role since July 1, 2023.

2. I submitted a Declaration in support of Plaintiffs' Motion for Preliminary Injunction. I am submitting this supplement to detail new information that the League has acquired and new activities that the League has undertaken since I filed my first declaration.

3. LWVA has learned of a member ("the League Member") who was subject to the Purge Program after the issuance of E.O 35. I reached out to the League Member today after finding out that she was included on the list, produced by Defendants, of voters purged for alleged non-citizenship.

4. The League Member is a naturalized citizen who has voted before. Prior to my informing her, the League Member was unaware that her voter registration had been cancelled.

5. The League Member, as of now, does not feel comfortable coming forward and identifying herself. In our conversation, she expressed that she was alarmed to find out that her voter registration had been cancelled for alleged non-citizenship.

6. LWVVA is currently dedicating additional volunteer time and the League's limited funds to distribute postcards to all the registered voters purged

from the voter list for alleged non-citizenship after the issuance of E.O. 35. The postcards include the same language as the postcards sent to the voters identified as likely to have been purged prior to E.O. 35 and included in paragraph 32 of my prior declaration.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 23, 2024 in Arlington, Virginia.

A handwritten signature in black ink, appearing to read "Joan Porte", is written over a horizontal line.

Joan Porte